

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Mr. Eric Wynn

21 CV 3503

Write the full name of each plaintiff.

(Include case number if one has been assigned)

-against-

Mr. David Sanders

Tucker Albin + Associates

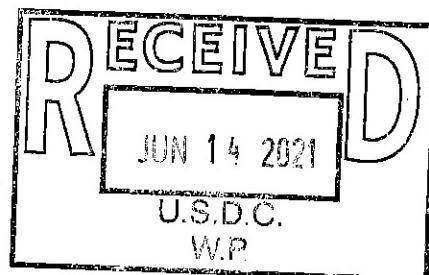
Mr Allen Humphris

**AMENDED**

**COMPLAINT**

Do you want a jury trial?

Yes  No



**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- Federal Question  
 Diversity of Citizenship

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

Violation of the F. D. C. P. A. - ACT  
F. D. C. P. A. - ACT / F. D. C. P. A. - ACT  
Attempting Strong Armery in getting Money  
With out Proof of money and

### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Mr. Eric Myer, is a citizen of the State of  
(Plaintiff's name)

New York

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, Mr. David Sanders, is a citizen of the State of  
(Defendant's name) ~~Texas, A~~  
TX, and of the United States.

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_

If the defendant is a corporation:

The defendant, \_\_\_\_\_, is incorporated under the laws of  
the State of \_\_\_\_\_

and has its principal place of business in the State of \_\_\_\_\_

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in \_\_\_\_\_

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Mr. Eric Wynn

First Name

Middle Initial

Last Name

Po Box 862

Street Address

Hartsdale

County, City

NY

State

10530

Zip Code

914 272-8883

Telephone Number

Email Address (if available)

## B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

First Name	Last Name	
Tucker, Albin & ASSOC		
Current Job Title (or other identifying information)		
1702 North Collins Blvd #100		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code
Richmond	TEXAS	75080

Defendant 2:

First Name	Last Name	Tucker Albin & ASSOC
Cec President		
Current Job Title (or other identifying information)		
1702 North Collins Blvd #100		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code
Richmond	TX	75080

Defendant 3:

First Name	Last Name	
Tucker Albin & ASSOC		
Current Job Title (or other identifying information)		
3190 South Vaughn Way #510		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code
Aurora	CO	80015

Defendant 4:

DAVID SANDERS  
First Name Last Name  
Tucker, Albin + ASSOC  
Current Job Title (or other identifying information)  
700 East Dietrich Road # 150  
Current Work Address (or other address where defendant may be served)  
Naperville IL 60563  
County, City State Zip Code

### III. STATEMENT OF CLAIM

Place(s) of occurrence: \_\_\_\_\_

Date(s) of occurrence: \_\_\_\_\_

#### FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Tucker, Albin + ASSOC sent me an E-MAIL on April 9 2021. A Mr David Sanders, about me owing \$3,016.00 PAY them directly or face having my credit and Dun and Bradstreet rating go down. So I Mr Ryan may not ~~be able~~ apply for anything that will <sup>be able</sup> be involved credit scoring.  
With my business and my personal.  
With instruction on how to send the money giving Mr Ryan (24 hr) to do everything strongly warning statement.  
Never stated that they were debt collector from out of state.  
This is an attempt to collect a debt was never stated.

Tucker Albin & associ.

Don't comply to the law under  
the (T.D.C.P.A - Act)

stated they filed lawsuits against  
Mr. wynn with in his county in New York state

Mr. wynn ask for proof was not able to get  
it on the payment with their client.

(acting) Any one can go garbage picking ~~and do it~~ with  
in there ~~claim~~ claim. Mr. wynn ask  
INJURIES: for proof on ~~get~~ get none but a note from them  
If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

~~Stress, worries, Anxiety Issues~~

~~Mr. wynn's Reputation + Personal Character  
and Good Name. I would have to EXPLAIN the  
damage over & over on my own Behalf in order  
to Do Business on a Personal Level + a Business  
Level. As well as other.~~

#### IV. RELIEF

State briefly what money damages or other relief you want the court to order.

~~Non Economic Damages. \$800,000 + 5,000,000~~

~~Stress, worries, ANXIETY ISSUES,  
Starting to mess up Mr. wynn's and his company  
with Dun + Bradstreet and other credit Agencies~~

~~Filing claims against Mr. wynn and his business  
for the dollar amount that Mr. David Sanders say that  
Mr. wynn owe their client. with a letter that  
will follow from Mr. David Sanders to Mr. wynn.~~

## V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

<u>Sund 1# 2021</u>		<u>James</u>	<u>Eric</u>	<u>Jayna</u>
Dated		<u>Plaintiff's Signature</u>		
First Name	Middle Initial	Last Name		
<u>Po Box</u>	<u>862</u>	<u>Hartsdale</u>	<u>New York</u>	<u>10530</u>
Street Address		County, City	State	Zip Code
<u>914 272-8883</u>				
Telephone Number	<u>Email Address (if available)</u>			

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

Yes  No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

CASE # ~~21-CV-3503~~

21-CV-3503

Eric Ryan

IV. Relife:

Non Economic~~s~~ Damages.

\$800,000      \$5,000,000.00

Eight Hundred      Five Million  
Thousand

Note:

would like to know if  
this is a scam operation  
from this company

Tucker, Abin & Assoc.  
Richmond Texas

CASE # ~~21-CV-3505~~  
21-CV-3503

Eric Myra

Case # 21-CV-3503

RICHARDSON — First, Pete Foster said they harassed his wife. Then he says they harassed him at his business in Addison, with a barrage of calls from a person impersonating a police officer.

"The person said they were a lieutenant in the sheriff's department, and if we didn't call back by a certain time, there would be further action," Foster said.

Legal action was the implication, he added.

But there was no police officer and no legal action. The calls — seven in all — were coming from a local bill collector, who Foster told to stop calling.

Foster later surmised the company had targeted an acquaintance of his, and was trying to dredge up information.

"I consider the phone calls and the messages an outright lie," Foster said.

The tactics he's describing are those of Tucker, Albin and Associates, a Richardson debt collection agency that collects business-to-business debts nationwide. Tucker, Albin's business practices are outlined in complaints to the Texas Attorney General and the Minnesota Department of Commerce.

"I have not seen a debt collection firm as obnoxious as this one is," complained Cliff Barr of San Antonio to the Texas Attorney General, which released complaints against the firm to WFAA through a Public Information Act request. "This company states they are trying to collect a debt, but do not have supporting documentation," Barr wrote. "They [Tucker, Albin] have clearly indicated the law does not apply to them."

But a few weeks ago, the Minnesota Department of Commerce issued Tucker, Albin a consent decree to curtail improper practices. It levied a civil penalty of \$500,000, its largest ever against a bill collector, officials said.

Eva Lynn

"It was deliberate, it was intentional, and it was a repeated practice of violation of the law," Commissioner Mike Rothman said.

Documents obtained under Minnesota's public records law indicate deception was integral to Tucker, Albin's business plan.

The firm used a technique called "spoofing," which disguised Tucker, Albin's number on a victim's caller ID. To the victim, the call might look like it was from a relative, but it was really from a bill collector.

The company's Collection Manual outlines a sequence of threats to targets, including:

- saying that a sheriff's sale of their property is forthcoming
- invoking the Internal Revenue Service
- suspending professional licenses

Tucker, Albin does not have the legal authority to do any of those things.

In scripts, collectors were taught to say they handled "litigation" for companies trying to collect debt. But there is little evidence to indicate Tucker, Albin performed that function.

Tucker, Albin employees were taught to impersonate private detectives, and to dig up information about the debtors they were trying to collect from. The script Tucker, Albin workers were to recite to debtors reads:

"Once I have collected all assets, liabilities, vendors, banks and clients who do business with (the debtor), I am to return all of my findings to [my client]."

"They're smearing people," Commerce Commissioner Rothman said.

Under its agreement with Minnesota, Tucker, Albin must rewrite its manual and discontinue deceptive practices. But WFAA was unable to determine if that has happened.

Five attempts to contact Tucker, Albin CEO Allen Humphris were unsuccessful.

A visit to the company's smoke break area brought hostility from a cadre of men, many of whom were wearing Tucker, Albin polo shirts. One man — who said his name was Carlos Hugee — said he didn't work for the company, but is instead a pole dancer. Another said his name was "Randy Travis."

TRENDING STORIES NEAR YOU

Inside their offices in a Richardson office park, we were told "our attorney is on his way" by the receptionist. The attorney never came.

Consumers are protected under the federal Fair Debt Collection Practices Act. Business-to-Business debt collections are not covered under most of that law, but they are covered under Section 5 of the FTC Act, which forbids deception.

To the United States federal court system:

Green-Jay Ltd is own and operated by Mr. James Eric Wynn.

Mr. James Eric Wynn is the sole proprietor of Green-Jay Ltd.  
So, what effect Green-Jay Ltd will affect Eric Wynn.

NOTE:

A **sole proprietorship**, also known as a **sole tradership, individual entrepreneurship or proprietorship**, is a type of enterprise owned and run by one person and in which there is no legal distinction between the owner and the **business entity**. A sole trader does not necessarily work "alone"—it is possible for the sole trader to employ other people.

The sole trader receives all profits (subject to taxation specific to the business) and has **unlimited responsibility** for all losses and debts. Every asset of the business is owned by the proprietor and all debts of the business are the proprietors. It is a "sole" proprietorship in contrast with **partnerships** (which have at least two owners).

A sole proprietor may use a **trade name** or business name other than their or its legal name. They may have to legally trademark their business name if it differs from their own legal name, the process varying depending upon country of residence.

Thank You  
Eric Wynn  
Green-Jay Ltd

Eric Wynn  
Case #  
21-CV-3503

# JUNO Message Center

From: "David Sanders" <d.sanders@tuckeralbin.com>

To: yellow148@juno.com

Sent: Fri, Apr 09, 2021 08:44 AM

Subject: REGUS MANAGEMENT GROUP, LLC VS GREEN JAY LTD

CASE #  
21-cv-3503

Attn: Eric Wynn

E-mail Address: yellow148@juno.com

Sent via e-mail only

Â

File No: 352001

Total Balance: \$ 3,016.86

Creditor: REGUS MANAGEMENT GROUP, LLCÂ

Â

My firm has been retained to protect and secure the rights of the above referenced creditor. It is our client's strong opinion that you have violated their trust.

Â

Before any action, directives and disclosures from the creditor are taken in Westchester County, we would like to give you twenty-four hours to show honest intent and resolve this indebtedness.

Â

This formal demand allows you a chance to fulfill your commitment, protect you and/or **Green Jay LTD** credit (D&B) and avoid any applicable additional costs and/or fees.

Â

You can telephone me to set up payment, or simply send a bank wire for the balance in full and fax me a copy of the wire receipt for proper application.

Â

Time is of the essence, govern yourself accordingly.

## Bank Wire Instructions

Payable to: Tucker, Albin & Associates

Bank: Texas Security Bank

Routing No: 111025877, Account No: 2021244

Swift Code: TESYUS41



TUCKER ALBIN  
& ASSOCIATES

## David Sanders

1702 N. Collins Blvd #100

Richardson, TX 75080

**Office:** (469) 424-3033 x503

**Faxsimile:** (972) 347-0551

**Email:** d.sanders@tuckeralbin.com

www.tuckeralbin.com

Â

David Sanders

(469) 424-3033 x503 Office

(972) 347-0551 Direct Facsimile

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Eric, I would not redirect my communications to my client. If we were hired to file suit against Green Jay LTD that will be the direction we go. Consider this an attempt to see if we can collectively handle this as professionals. I can point out that emotional responses are not the best. I will ask again when we can talk today. If this is not something you plan on doing I understand and respect that. You and Green Jay LTD will also be expected to respect the job we have to do and what steps come with that. I offer a chance to mediate if you want it. David Sanders Legal Review/ Processing Tucker, Albin & Associates, Inc. 469-424-3033 ext. 503 file# 352001

Note: Received to tucker, Albin + Associates  
and Mr Wayne Request for Proc 7  
of claim with three ~~clients~~  
Reqs management <sup>Clients</sup> R.L.

case #  
21-cv-3503

Eric

Note: (to be included with relief also)

IV:

If I can ask.? I would like to claim a dollar amount for \$ 18,000,000 Million Dollars  
NON – Economical Damages: Just for them being able to run a scam on me Eric Wynn.  
For them making statement of filing a claim agents' me and my company; that will place a lean  
on my credit rating with in the United States. form anther jurisdiction, and for giving me only  
24 hrs. notices to send them the money.to there account, and for not stating that they are a debt  
collection agency. "This is an attempt to collect a debt". Was not mention form them at all; and  
for violations of the F.D.C.P.A – Act. & Others.

As well as for also making statements of Eric Wynn bouncing Check across state lines. (No  
Money in His bank account. (The bank verified the check was fully funded.)

(The Bank was waiting for the check to clear and then it timed itself out after 60 or 90 days uncashed so  
was sent out agrion and agrion. Their client may have wanted the check to have timed out, having to held  
on to the check.) if they were client at all.

With the Posable claims of:

1. Extortion, or attempts of Extortion.
2. attempts of blackmailing
3. attempts of strongarming
4. attempts of false and/or misleading information giving, in order to collect on a debt.

Would like to know if this Is a scam operation with /from this company. Tucker, Albin & Associates. & With  
Their members / worker/ Employees, partners / others terms in connection or relationship with this  
company

(Note) This company has offices in several other states with in the USA, outside and beyond the state  
Texas.

*Eric Wynn*